

Before the  
POSTAL REGULATORY COMMISSION  
Washington, DC 20268-0001

First-Class Mail and Periodicals :  
Service Standards Changes, 2021 : Docket No. N2021-1

GREETING CARD ASSOCIATION REVISED INTERROGATORY TO  
UNITED STATES POSTAL SERVICE WITNESS WHITEMAN

Discussions via e-mail with Postal Service counsel have resulted in agreement on a revised interrogatory GCA/USPS-T-2-2(b). This interrogatory was the subject of a Postal Service motion to be excused from answering, filed on May 17, 2021. The revision affects the second sentence of GCA/USPS-T-2-2(b).

Accordingly, pursuant to Order No. 5875 and 39 CFR sec. 3020.116, the Greeting Card Association (GCA) withdraws GCA/USPS-T-2-2 as originally formulated and submits in its place this revised interrogatory and/or request for documents, as follows:

GCA/USPS-T-2-2

The term “documents” includes (without limitation) letters, memoranda, telegrams, reports, studies, articles from periodicals, speeches, testimonies, books and extracts from books, pamphlets, tabulations, and work papers. In terms of format, “documents” includes written or printed records and disks, tapes, portable drives, or other recorded media, together with such written or printed material as is necessary to understand and use such disks, tapes, drives or other recorded media.

Any part of the interrogatory may be re-directed to one or more other witness(es), or answered institutionally, as necessary.

May 19, 2021

Respectfully submitted,

GREETING CARD ASSOCIATION

David F. Stover  
2970 S. Columbus St., No. B1  
Arlington, VA 22206-1450  
(703) 998-2568 or (703) 395-1765  
E-mail: [postamp02@gmail.com](mailto:postamp02@gmail.com)

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2. Please refer to pages 8-9 of your prefiled testimony, where you explain that there will be no immediate change in the network connecting Network Distribution Centers (NDCs) because the mail primarily using this network is not affected by the instant service standard changes.

(a) Please confirm that the products which you refer to as using the NDC network are identical with the class of all products other than First-Class Mail and end-to-end Periodicals. If you do not confirm, please provide a correct identification of the products you refer to as using the NDC network.

(b) Did you, or, to your knowledge, anyone within the Postal Service or among its consultants, investigate whether savings in the NDC network could be achieved by changing the service standards for some or all of the mail using that network? If your answer is affirmative, please state briefly whether or not that investigation found potential savings. If your answer is negative, please provide your understanding of why no such investigation was undertaken.